1	Catherine A. Becker LAW OFFICE OF ELIZABETH G. SMITH 1730 Minor Ave., Ste. 1130 Seattle, WA 98101 Telephone: 206-403-4812 Facsimile: 877-338-4416	The Honorable Ricardo S. Martinez	
2			
3			
4			
5	E-mail: beckec8@nationwide.com Attorneys for Defendant Township Retail Service	es, LLC	
6			
7			
8	UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT TACOMA		
9			
10			
11	DEBORAH VOGT-MATTHEWS,	NO. 3:19-cv-05641-RSM	
12	Plaintiff,		
13	V.	STIPULATED MOTION TO CONTINUE JURY TRIAL AND CASE	
14	TOWNSHIP RETAIL SERVICES, LLC Defendants.	DEADLINES	
15			
16	COME NOW the parties, by and through their undersigned counsel, and stipulate for the continuance of the currently scheduled jury trial. The current trial date is November 30,		
17			
18	2020. Counsel for defendant Township Retail Services, LLC, Catherine Becker, is on		
19	maternity leave until November 23, 2020. Counsel Becker filed a Notice of Unavailability		
20	stating she would not return from maternity until November 23, 2020.		
21	Ms. Becker's files are being handled by contract attorney Kelly M. Madigan. Ms.		
22	Madigan's contract expires on November 30, 2020. Ms. Becker has two (2) trials in		
23	December 2020 and three (3) trials in January 2021.		
24	The parties have collaboratively exchanged written discovery and depositions have		
25	been taken in the case. The parties have also agreed to engage in mediation on September		

STIPULATED MOTION TO CONTINUE JURY TRIAL AND CASE DEADLINES Cause No.: 3:19-cv-05641-RSM

LAW OFFICE OF ELIZABETH G. SMITH 1730 Minor Avenue, Suite 1130 Seattle, Washington 98101 (206) 403-4800

29, 2020. The parties are only seeking a short continuance to accommodate Ms. Becker's 1 maternity leave and trial schedule. 2 The parties respectfully request the Court issue an amended case scheduling order 3 with the following deadlines: 4 Discovery deadline: 10/16/2020 5 All dispositive motions filed by: 11/09/2020 6 Settlement conference per LCR 39.1(c)(2) held by: 11/30/2020 7 Mediation per LCR 39.1(c)(3) held by: 12/20/2020 8 Letter of compliance as to LCR 39.1 filed by: 01/15/2021 9 Motions in Limine filed by: 01/11/2021 10 Agreed Pretrial Order or Witness and Exhibit Lists: 01/22/2021 11 Pretrial conference held at 8:30 a.m.: 01/29/2021 12 Jury Trial: 02/08/2021 13 14 IT IS SO ORDERED this 21st day of September, 2020. 15 16 17 RICARDO S. MARTINEZ 18 CHIEF UNITED STATES DISTRICT JUDGE 19 20 21 Submitted this ____ day of ____ , 2020. 22 23 24 Kelly M. Madigan, WSBA #40024 25 Law Office of Elizabeth G. Smith E-mail: madk712@nationwide.com

STIPULATED MOTION TO CONTINUE JURY TRIAL AND CASE DEADLINES
Cause No.: 3:19-cv-05641-RSM

LAW OFFICE OF ELIZABETH G. SMITH

1730 Minor Avenue, Suite 1130 Seattle, Washington 98101 (206) 403-4800

Case 3:19-cv-05641-RSM Document 19 Filed 09/21/20 Page 3 of 3

1	Attorneys for Defendant Township Retail Services, LLC (dba Township Retail Services, Inc).
2	10 William Str. 1200, 1110).
3	
4	Jeffrey H. Sadler, WSBA #27136
5	Sadler Injury Law Group, LLP
6	E-mail: jeff@sadler-law.com Attorneys for Plaintiff
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
ا دے	

STIPULATED MOTION TO CONTINUE JURY TRIAL AND CASE DEADLINES Cause No.: 3:19-cv-05641-RSM